PATENT APPLICATION
DOCKET NO. 10990665-1

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

INVENTOR(S): Rogelio Robles, et al.

SERIAL NO.: 09/887,306   **GROUP ART UNIT:** 2178

FILED: June 22, 2001   **EXAMINER:** Paula, Cesar B.

SUBJECT: DOCUMENT PRODUCTION IN A DISTRIBUTED ENVIRONMENT
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APPELLANT'S/APPLICANT'S REPLY BRIEF

The Appellants/Applicants filed an appeal brief on July 26, 2006. The Examiner
mailed an Answer addressing the appeal brief on October 18, 2006. In the following
remarks, the Appellants/Applicants respond to the Examiner's comments and
arguments.

<u>**APPELLANTS'/APPLICANTS' REPLY BRIEF**</u>

GROUNDS FOR REJECTION TO BE REVIEWED.

In the Appeal Brief, the grounds for rejection to be reviewed were set out as follows:

A.   Claims 1-5, 7-9, and 11-18 were rejected under 35 USC §103 as being unpatentable over US Pub 2001/0013947 to Van Der Linden.

B.   Claims 19-24, 26-29, 31, 34-37, and 39 were rejected under 35 USC §103 as being unpatentable over USPN 6,477,589 issued to Suzuki in view of US Pub 2004/0148335 to Keeny.

ARGUMENT.

A.   Ground For Rejection A – Claims 1-5, 7-9, and 11-18 were rejected under 35 USC §103 as being unpatentable over US Pub 2001/0013947 to Van Der Linden.

Claim 1 is directed to a method for managing electronic document production over a computer network and recites the following acts:

- presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;

- presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

- merging the selected services and the captured production request into a production plan; and

- delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

Claim 1 recites a method that utilizes two user interfaces. The first is for selecting services. The second is for selecting production devices identified as being capable of providing services selected through the first user interface. The Appellant maintains that Van Der Linden mentions nothing of presenting a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface.

In response to the Appellant's position on this point, the Examiner makes the following statement.

> Vanderlinden teaches the display of an automatically updated graphical user interface for selecting a newly available printing option available at a printer, such as an option to print to transparent media at a reproduction center (0042,0051,0059, fig.3). For example, as a user chooses various printed options, paper format, etc., a new printer comes online at a reproduction center, the interface is automatically updated to include the option to print on transparent media using the newly installed printer, which is the only printer having such capabilities. The user can then access the pull-down menu which has been updated with the newly added option, and choose that option to print the document on the **transparent media on the newly added printer** *using the print options utilized before the interface was updated*. Thus, the user is able to indirectly select the newly added printer, using the updated *interface-second interface--since* it is the printer capable of printing to transparent media.

Examiner's Answer, page 15. In short, the Examiner asserts that Van Der Linden teaches an interface shown in Van Der Linden's Figure 3 updated to include new print options. The Examiner equates this interface, reproduced below with the second user interface recited in claim 1. This is plainly not correct. The recited second interface has "user accessible controls for *selecting* one or more, if any, *document production devices* identified as being capable of providing services selected through the first user interface." Van Der Linden's interface shown in Figure 3 below does not have controls

for selecting a document production device. The only controls available are for selecting services such as paper options, color options, and finishing options.

Fig. 3

REPRO ORDER FORM

Customer

Name		Phone	
Company		Order-No.	
Department		Password	
Email-adress			

Print Options

Paper Format	A4	Copies	1
Paper	80 g	Color	black/white
	100 g	Finish	stapled
	transparent		

Delivery

| fetched by customer | Date | as soon as possible |

| Preview | Submit | Cancel |

The Examiner, however, continues to ignore the fact that Van Der Linden teaches away from the claimed invention by requiring that a reproduction center operator or a "scheduler" at the reproduction center to identify and select a capable printer. *See* Van Der Linden, [0055] and [0060]. Van Der Linden's interface merely allows a user to select options that will be implemented by a printer that is subsequently selected by a reproduction center operator.

In other words, a printer is NOT selected through Van Der Linden's interface directly or indirectly. Consequently Van Der Linden fails to teach or suggest a method that includes "presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface."

For at least these reasons, Claim 1 is patentable over Van Der Linden as are Claims 2-5, 7, and 8 which depend from Claim

Claim 9 is directed to a computer program product for managing electronic document production over a computer network. The product comprising a computer useable medium having computer readable instructions for performing the method of Claim 1. For the same reasons Claim 1 is patentable, so are Claim 9 and Claims 11-18 which depend from Claim 9.

B.   Ground For Rejection B – Claims 19-24, 26-29, 31, 34-37, and 39 were rejected under 35 USC §103 as being unpatentable over USPN 6,477,589 issued to Suzuki in view of US Pub 2004/0148335 to Keeny.

Claim 19 is directed to system for managing production requests and, as amended, recites the following elements:

1. a production client operable to receive a production request, the client comprising:
    a. a capture driver operable to capture the production request; and
    b. an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if

any, production devices identified as being capable of providing services selected through the first user interface;

2. a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services, the production server comprising:

   a. a services engine operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and

   b. a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface

Claim 19 recites a system that utilizes a production client that presents two user interfaces. The first is for selecting services and the second is for selecting production devices identified as being capable of providing services selected through the first user interface. The system also utilizes a production server that provides the production client with the first and second user interfaces. More specifically, the production server, after providing the first interface, receives selections made through the first interface to then automatically identify production devices to include in the second user interface. In other words, the system recited in Claim 19 automatically generates a second user interface that identifies production devices that are capable of providing the specific services selected by a user through the first interface.

The Appellant maintains that the cited references mention nothing of a second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface.

In response to the Appellant's position on this point, the Examiner makes the following statement.

> Regarding claim 19, Appellant argues that the figures and passages quoted by the Examiner do not disclose a user interface having controls for selecting services for producing a production request (page 12). The Examiner disagrees, because Suzuki mentions a graphical user interface, which has various selection menu options, such as a printer device, image editing, print, etc. Once the option has been chosen, a second window is presented listing devices capable of providing services associated with the selected option (coLl9, lines 7-67, fig.26, 32-36, 38- 42). In other words, <u>the menu options allow a user to send a request to the selected device for producing documents, such as the printing of data.</u>

Examiner's Answer, pages 15 and 16.

The Examiner misconstrues the Appellant's argument. The Appellant does not simply argue that the cited references do not disclose a user interface having controls for selecting services for producing a production request. Instead, the Appellant explicitly argued at page 12 and continues to maintain that the cited references fail to teach or suggest a second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface.

For at least these reasons Claim 19 and Claims 20-24 and 26-28, which depend from Claim 19, are patentable over Suzuki in view of Keeney.

Claim 29 is directed to a distributed document production system that includes a services engine and a production engine operating on one or more computing devices that are remote from a production client. The services engine is operable:

- to obtain a selection of one or more services for producing a production request captured by the production client;
- to automatically identify one or more, if any, production devices capable of providing the selected services; and

- to obtain a selection of one or more of the identified production devices from the production client.

The production engine is operable to deliver the captured production request to a selected production device.

Claim 29 recites a system that is configured to first obtain a selection of services for a production request and to then to automatically identify one or more, if any, production devices capable of providing the selected services, and to then obtain a selection of one or more of the identified production devices from the production client.

The Appellant maintains that the cited references only teach the use of user interfaces to select a device where that device meets a criteria that it is a printer as opposed to some other type of device. The references fail to teach a service engine that is operable to obtain a selection of one or more services for producing a production request captured by the production client or to automatically identify one or more, if any, production devices capable of providing the selected services.

For at least these reasons, Claim 29 is clearly patentable over Van Der Linden as are Claims 31, 34-37, and 39 which depend from Claim 29.

Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,
Rogelio Robles, et al.

By _/Jack H. McKinney/_____
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December 18, 2006   Reg. No. 45,685

APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. (previously presented) A method for managing electronic document production over a computer network, the method comprising:

presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;

presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

merging the selected services and the captured production request into a production plan; and

delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

2. (previously presented) The method of Claim 1, further comprising identifying available services on the network, and generating the first user interface with user accessible controls for selecting the identified services.

3. (previously presented) The method of Claim 2, wherein the act of generating the first user interface includes generating the first user interface with user accessible controls for selecting services not available on the network.

4. (previously presented) The method of Claim 2, wherein the act of identifying available services includes querying devices present on the network.

5. (previously presented) The method of Claim 2, wherein the act of identifying available services includes querying a services database.

6. (cancelled)

7. (previously presented) The method of Claim 1, further comprising identifying document production devices capable of providing services selected through the first user interface and generating the second user interface with user accessible controls for selecting one or more, if any, of the identified document production devices.

8. (previously presented) The method of Claim 1, further comprising monitoring the status of delivered production plans.

9. (previously presented) A computer program product for managing electronic document production over a computer network, the product comprising a computer useable medium having computer readable instructions thereon for:

presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;

presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

merging the selected services and the captured production request into a production plan; and

delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

10. (cancelled)

11. (previously presented) The product of Claim 9, comprising further instructions for identifying services available on the network, and the instructions for presenting the first user interface comprise instructions for generating the first user interface with user accessible controls for selecting the identified services.

12. (previously presented) The product of Claim 11, wherein the instructions for presenting the first user interface comprise further instructions for generating the first user interface with user accessible controls for selecting services not available on the network.

13. (original) The product of Claim 11, wherein the instructions for identifying comprise instructions for querying devices present on the network.

14. (original) The product of Claim 11, wherein the instructions for identifying comprise instructions for querying a services database.

15. (original) The product of Claim 14, comprising further instructions for identifying services available on the network but not contained in the service database and updating the services database with the identified services.

16. (original) The product of Claim 15, further comprising identifying services not available on the network and not contained in the services database and updating the services database with the identified services.

17. (previously presented) The product of Claim 9, further comprising instructions for identifying document production devices capable of providing services selected through the first user interface and generating the second user interface with user accessible controls for selecting one or more, if any, of the identified document production devices.

18. (previously presented) The product of Claim 9, further comprising instructions for monitoring the production status of delivered production plans.

19. (previously presented) In a computer network, a system for managing production requests, comprising:

a production client operable to receive a production request, the client comprising:

a capture driver operable to capture the production request; and

an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface;

a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services, the production server comprising:

a services engine operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and

a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface.

20. (previously presented) The system of Claim 19, wherein the capture driver is further operable to transform the production request into a selected format and to transfer the formatted production request to the production server.

21. (previously presented) The system of Claim 19, wherein the production server further comprises a web server for communicating with the client and the client interface translator is a web browser.

22. (previously presented) The system of Claim 19, wherein the services engine includes a services locator operable to identify services available on the network.

23. (previously presented) The system of Claim 22, wherein the production server further comprises a database of known services available on the network.

24. (original) The system of Claim 23, wherein the services locator is operable to identify available services by querying the database and by querying the document production devices present on the network.

25. (cancelled)

26. (original) The system of Claim 19, wherein the production engine includes a production queue.

27. (original) The system of Claim 26, wherein the production engine further includes a production manager in electronic communication with the production queue.

28. (original) The system of Claim 19, wherein the Client further comprises a server locator.

29. (previously presented) A distributed document production system comprising a services engine and a production engine operating on one or more computing devices that are remote from a production client, wherein:

the services engine is operable to obtain a selection of one or more services for producing a production request captured by the production client, to automatically identify one or more, if any, production devices capable of providing the selected services, and to obtain a selection of one or more of the identified production devices from the production client; and

the production engine is operable to deliver the captured production request to a selected production device.

30. (cancelled)

31. (previously presented) The document production system of Claim 29, wherein the production engine is operable to merge the selection of services and the captured production request into a production plan and deliver the production plan in a device specific format to one or more document production devices selected through the second user interface.

32. (cancelled)

33. (cancelled)

34. (previously presented) The document production system of Claim 29, further comprising a services database and wherein the services engine includes a services locator operable to locate services by querying the services database.

35. (previously presented) The document production system of Claim 34, wherein the production services locator is further operable to locate services by querying document production devices.

36. (original) The document production system of Claim 34, wherein the production server further includes an update service operable to update the services database with services available on the document production devices but not currently represented in the services database.

37. (original) The document production system of Claim 36, wherein the production engine includes drivers for the production devices and wherein the update service is further operable identify new devices and to update the device drivers with drivers for newly identified devices.

38. (cancelled)

39. (previously presented) The document production system of Claim 29, wherein the production engine includes a production queue and a production manager in electronic communication with the production queue.

40. (cancelled)